

Revised Development Strategy Response Form 2013

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Ref:

Rep. Ref.

Please use this form if you wish to support or object to the Local Plan - Revised Development Strategy.

If you are commenting on multiple sections of the document you will need to complete a separate copy of Part B of this form for each representation.

This form may be photocopied or, alternatively, extra forms can be obtained from the Council's offices or places where the plan has been made available (see back page). You can also respond online using the LDF Consultation System, visit: www.warwickdc.gov.uk/newlocalplan

Part A - Personal Details

	1. Personal Details	2. Agent's Details (if applicable)
Title		Mr
First Name		Paul
Last Name		Hill
Job Title (where relevant)		Technical Director
Organisation (where relevant)	Lenco Investments Ltd	RPS Planning & Development
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Would you like to be made aware of future consultations on the new Local Plan?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
About You: Gender		
Ethnic Origin		
Age	<input type="checkbox"/> Under 16 <input type="checkbox"/> 16 - 24 <input type="checkbox"/> 25 - 34 <input type="checkbox"/> 35 - 44	
	<input type="checkbox"/> 45 - 54 <input type="checkbox"/> 55 - 64 <input type="checkbox"/> 65+	
Where did you hear about this consultation e.g. radio, newspaper, word of mouth, exhibitions, bin hanger?		

Part B - Commenting on the Revised Development Strategy

If you are commenting on multiple sections of the document you will need to complete a separate sheet for each representation

Sheet of

Which part of the document are you responding to?

Paragraph number / Heading / Subheading (if relevant)

4.1.3 – 4.1.10

Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support Object

Please set out full details of your objection or representation of support. If objecting, please set out what changes could be made to resolve your objection (Use a separate sheet if necessary).

RPS acts on behalf of Lenco Investments Ltd which is the controlling landowner for the Land South of Baginton (SHLAA reference C10)

Justification for 12,300 dwellings - SHMA

4.1.1 While the intentions to proceed with the Council's local plan in a timely manner is supported, the Revised Development Strategy as presented is currently not sound, justified or positively prepared based on the basis that the 12,300 figure is only an *'interim figure'*. While paragraphs 4.1.3 through to 4.1.10 seek to illustrate a chronological approach to justifying the housing requirement, it is not clear how this evidence has actually informed or justified the final 12,300 figure in the concluding paragraph.

The NPPF clearly sets out in paragraph 159 that local planning authorities should prepare a SHMA to assess their full housing needs, working with neighbouring authorities where housing markets cross administrative boundaries. In doing so, the SHMA should identify the scale and mix of housing that the local population is likely to need over the plan, period which meets the household and population projections, taking into account of migration and demographic change. It is therefore clear that the need for a SHMA that appropriately addresses the cross boundary issues is required and that this should take account of demographic change. The SHMA guidance also sets out that in preparing a SHMA local economic forecasting should be part of the evidence base used to establish housing need.

Notwithstanding the fact that Coventry's unmet housing need will have a significant influence on Warwick's eventual housing requirement, it is essential that Warwick's own Objectively Assessed Need for market and affordable housing is established in the first instance in accordance with paragraph 47 of the NPPF, before any need associated with Coventry is considered.

In this context, the Council has commissioned a number of studies including an updated SHMA which is due to be published in August 2013. However, until this is available the Council has based the interim figure on evidence already in the public domain. This presumably comprises principally the 2012 SHMA and the 2012 Economic and Demographic Forecasts Study (EDFS). These have been informed by a series of population and household projection, including some of the most recent 2011 census data.

Paragraph 4.16 outlines that the evidence in the updated SHMA indicates a range between 11,300 and 14,300 based upon demographic and economic scenarios respectively. However, it is not clear how either of these figures have been derived from Figure 2.22 of the SHMA that provides the summary of the scenarios. The figures of 11,300 and 14,300 are not present in the table, nor consistent with the additional element that needs to be accounted for with the difference in plan period between the tables and that of the Revised Development Strategy document. However, it is understood that these figures have been updated by the publication of the EDFS and will be superseded by the expected August 2013 SHMA.

According to paragraph 4.1.8, the EDFS study identifies that the employment led population and household projections suggested that there is a need for between 13,300 and 13,800 additional homes between 2011 and 2029.

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Employment Forecasts

In respect of the economic forecasts, the methodology sets out that the baseline scenario assumes the level of growth based upon the Local Economic Forecasting Models (LEFM). This is derived from the Cambridge Econometrics forecasting data and is a baseline projection for the two authorities of Coventry and Warwick. It is advised that when using this data, that it is policy neutral and does not include assumptions on planning policy and that these assumptions need to be made at the local level when using the data. The EDFS study has sought to derive 'policy on' housing numbers and sensitivity scenarios based upon job levels associated employment at the Gateway Site. Sensitivity 'policy on' tests are based upon a potential displacement effect of employment moving from other areas of Coventry and Warwick to the Gateway Development Site. The displacement effect scenarios suggests that either 0% (scenario 1,) 25% (scenario 2), or 50% (scenario 3) of employment floorspace could be displaced from elsewhere in Coventry and Warwick where employment land is already available or in the pipeline. The housing numbers derived from these scenarios are therefore proportionally similar in quantum. The logic behind this is, however, questioned.

Implications of Gateway Site

On the basis of scenario 1 where 100% of the job creation at Gateway site is all new additional employment without displacement, the housing requirement is derived from 100% level of job associated with the Gateway site, i.e. all net new employees requiring homes in Warwick and Coventry. In the sensitivity scenarios the EDFS study assessed the likely housing requirement associated with 25% and 50% of employment floorspace being displaced to the Gateway site from existing employment floorspace either in use or in the pipeline, rather than new floorspace. This therefore assumes workers are already accounted for within the existing floorspace provisions (and presumably within the existing or planned housing stock) and therefore are not additional workers to the area requiring new homes.

The assumptions made in the evidence suggest that as a result of this, the housing requirement is likely to be proportionally lower as those people are already accounted for in housing terms in the existing locations from which the displaced floorspace originates. On this basis the housing requirement is reduced as there is less need for additional in migrants.

However on the basis that 25% or 50% employment is being displaced from existing areas of Warwick and Coventry, the assumption has to also be true that this displaced employment is **lost** in the respective displaced locations or it is **backfilled** by other employment. On the basis that it is lost and with the 50% displacement scenario of new floorspace moving to the Gateway site, the logic suggests that a significant shift in the district's employment workforce will move to the Gateway site area south of Coventry, leaving vacant land in employment land at other locations. The 25% scenario would be the same effect but to a lower magnitude. On the basis that it is backfilled by other employment, the scenarios do not result in a housing decrease as there would always be a net gain in workforce required. This issue therefore needs more clarity and justification if the authority is to use the scenarios within any final housing requirement figure.

Employment land meeting Warwick's need

In the context of the above, it is noted in paragraph 4.6.5 of the consultation document that the Council has accepted that some of the employment land to the new Gateway site to the South of Coventry **will** be meeting Warwick's need and that it is estimated that this would be in the region of 6.5ha. This is unfortunately not expressed as a percentage in order to compare it with the scenarios tested, nor is it confirmed as to whether this is a displacement resulting in lost employment land elsewhere or whether it is backfilled. The conclusion in the document is, however, that 6.5ha of the district's employment land will be provided for through the Gateway site south of Coventry. Despite the uncertainty of this statement and the lack of clarity on its relationship to the sensitivity scenarios that have been undertaken, it is assumed by RPS that this 6.5ha of employment land to be provided at the Gateway site is in fact net additional employment land and not displaced from the loss of existing employment land elsewhere in the District.

In seeking to justify its housing requirement, the Council has accepted that a degree of shift in employment will take place from existing areas to the Gateway site, but it is not clear how this has actually translated into the justification of housing need in establishing the requirement of 12,300 dwellings.

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Paragraph 4.1.8 sets out that the economic projections point to a need of between 13,300 dwellings and 13,800 dwellings between 2011 – 2029, depending upon the Gateways Scheme displacing jobs in the district. However, paragraph 6.6 and figure 44 set out that the figures are between 13,100 and 13,900 dwellings for 8,745 jobs and 9,900 jobs respectfully. Given the above, and the acceptance by the Council that the Gateway Scheme is likely to have a small influence on the district, the figure is therefore likely to be closer to the 13,900 dwellings figure (with the associated 9,900 jobs)

Lack of linkage in justifying the 12,300 and evidence

As understood from the above, the Council has undertaken a considerable amount of analysis of the potential linkages between demographic and economic evidence alongside the relative impact of the Gateway site and therefore RPS would expect the housing requirements to be justified in light of this. However, in arriving at a final figure of 12,300 dwellings in paragraph 4.1.10 the Council's Revised Strategy, the justification appears to come from different a source of evidence and assumptions of GVA and 'economic modelling work' which is not apparent in the documents in the public domain.

The statement refers to the Latest ONS projections of 11,500 homes delivering a GVA rate of 2.3% which is equivalent to the West Midlands forecast. Then the statement refers to the Councils GVA rate being more in-line with the national rate which is forecast to be 2.5%, and therefore the Council has selected a rate of 2.5% as a midway point which it sets out in 12,300 new homes.

Firstly it is not clear in the evidence where this economic modelling is documented or justified, nor how it has considered the full range of scenarios assessed in detail in the Economic and Demographic Forecast Study. This is therefore not justified at present unless a clear audit of the evidence base can be demonstrated.

Furthermore the assumptions about GVA are incorrect according to the Council's own evidence. The GVA evidence in the Councils forecasting study indicates that GVA for Warwick will outperform the West Midlands on its base forecast and will be as high as 2.9% by 2025 (Figure 5) compared to a figure of 2.6% for the west midlands. Given that the document consistently refers to the district outperforming the West Midlands it would therefore appear logical to plan on the basis of at least 2.9% rather than 2.4%. This is further substantiated by Figure 12 of the document indicating that the Gateway Development itself could increase GVA in Warwick District by between 8% and 10% over its base figure, thus it is likely to be in the region of 3% overall.

Conclusion

In conclusion, it is clear that the Council has undertaken an extensive amount of evidence gathering and scenario testing to establish a housing and employment figure, however, it has not used or applied this consistently. The 12,300 figure is not justified on GVA terms, nor is it justified through the economic or demographic evidence available in the Economic or Demographic Forecasting Study. The 12,300 figure will also not support the 10,200 jobs being planned for in accordance with figure 42 of the Councils forecasting study.

It is expected that the 2013 joint SHMA will provide a greater degree of clarity on the housing need for Warwick (including cross boundary need) but in the absence of this, RPS concludes that the figure needs to be reflective of the evidence available. It is also noted that the Inspector for the Leicester Core Strategy has indicated that there is a need for an up to date SHMA in order to have effective and robust cross boundary evidence of cooperation. On this basis the figure should be reflective of the economic potential of the district based upon the influence of the Gateway Development and high levels of GVA than 2.5%.

This should therefore be considerably higher than the 13,900 dwellings (figure 42). The justification for this is:

- The authority is planning to provide some 10,200 additional jobs over the plan period which is even higher than the 9,900 associated with 13,900 dwellings RPS recommends is the minimum to be considered ;
- GVA forecasts are predicated to in the range of 2.9% and not 2.4%;
- GVA from the Gateway Development is expected to push GVA up to at least 3%
- The Gateway site already now has planning consent (subject to S106) and will have an impact on the district's requirements including the provision of some 10,000 new jobs;
- The needs of Coventry have not been considered and will need to be taken into account in addition to Warwick's needs;

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- The demographic study has used 2011 census household size figures and forecast them across the whole plan period rather than the acceptance that this is unlikely to occur and trends akin to the 2008 projections or close to them are accepted by many as likely to occur

The 2012 Strategic Housing Land Availability Assessment (SHLAA) indicates that between 2014 and 2029 the Council has a supply of 13,385 on deliverable sites, excluding windfall sites. This notably and inappropriately excludes that site promoted by RPS at Baginton. Therefore, it is evident that a greater number of dwellings than the interim level proposed, can be delivered within the District to contribute towards housing needs.

In respect of cross-boundary requirements, the NPPF requires cross-boundary cooperation between Local Planning Authorities to ensure housing needs are met, in particular for those which cannot meet their needs within their own administrative boundaries, such as Coventry City Council. It is recognised that Coventry cannot meet their housing targets within their own administrative boundary, as the 2012 Coventry SHLAA indicates. Development is therefore necessary adjacent to the urban areas in cross-boundary locations, particularly into Warwick and Nuneaton and Bedworth authority areas to ensure Coventry's housing needs can be met, and ensure compliance with the NPPF. Therefore, Warwick District Council should work with Coventry to assist in providing a proportion of Coventry's housing requirement.

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Map (e.g. Proposed Development Sites – District Wide)

What is the nature of your representation?

Support

Object

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Guidance on Making Representations

- Please use this response form as it will help the Council to keep accurate and consistent records of all the comments on the Plan, alternatively complete online at www.warwickdc.gov.uk/newlocalplan
- If you wish to make comments on more than one aspect of the Plan, please use a separate copy of Part B of this form for each
- You may withdraw your objection at any time by writing to Warwick District Council, address below
- It is important that you include your name and address as anonymous forms cannot be accepted. If your address details change, please inform us in writing
- All forms should be received by 5.15pm on Monday 29 July 2013
- Copies of all the objections and supporting representations will be made available for others to see at the Council's offices at Riverside House and online via the Council's e-consultation system. Please note that all comments on the Local Plan are in the public domain and the Council cannot accept confidential objections. The information will be held on a database and used to assist with the preparation of the new Local Plan and with consideration of planning applications in accordance with the Data Protection Act 1998
- To return this form, please drop off at one of the locations below, or post to: Development Policy Manager, Development Services, Warwick District Council, Riverside House, Milverton Hill, Leamington Spa, CV32 5QH or email: newlocalplan@warwickdc.gov.uk

Where to see copies of the Plan

Copies of the Plan are available for inspection on the Council's web site at www.warwickdc.gov.uk/newlocalplan and at the following locations:

Location	Opening Times
Warwick District Council Offices Riverside House, Milverton Hill, Royal Leamington Spa	Mon – Thurs 8.45am – 5.15pm Fri 8.45am – 4.45pm
Leamington Town Hall Parade, Royal Leamington Spa	Mon – Thurs 8.45am – 5.15pm Fri 8.45am – 4.45pm
Warwickshire Direct Whitnash Whitnash Library, Franklin Road, Whitnash	Mon – Tues 10.30am – 5.00pm Wed 1.30pm – 5.00pm Thurs Closed Fri 10.30am – 4.00pm Sat 10.30am – 1.30pm
Leamington Spa Library The Pump Rooms, Parade, Royal Leamington Spa	Mon – Weds 9.30am – 6.00pm Thurs 10.00am – 7.00pm Fri 9.30am – 6.00pm Sat 9.30am – 4.30pm Sun 12.00pm – 4.00pm
Warwickshire Direct Warwick Shire Hall, Market Square, Warwick	Mon – Thurs 8.00am – 5.30pm Fri 8.00am – 5.00pm Sat 9.00am – 4.00pm
Warwickshire Direct Kenilworth Kenilworth Library, Smalley Place, Kenilworth	Mon – Tues 9.00am – 5.30pm Wed 10.30am – 5.30pm Thurs – Fri 9.00am – 5.30pm Sat 9.00am – 1.00pm
Warwickshire Direct Lillington Lillington Library, Valley Road, Royal Leamington Spa	Mon and Fri 9.30am – 12.30pm & 1.30pm – 6.00pm Tues 9.30am – 12.30pm & 1.30pm – 5.30pm Weds Closed Thurs 9.30am – 12.30pm & 1.30pm – 7.00pm Sat 9.30am – 12.30pm
Brunswick Healthy Living Centre 98-100 Shrubland Street, Royal Leamington Spa	Mon – Fri 9.00am – 5.00pm
Finham Community Library Finham Green Rd, Finham, Coventry, CV3 6EP	Mon 1.00pm – 7.00pm Tues, Thurs and Fri 9.00am – 7.00pm Sat 9.00am – 4.00pm

Where possible, information can be made available in other formats, including large print, CD and other languages if required. To obtain one of these alternatives, please contact 01926 410410.

